

FILED

JUL 05 2024

CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
AKRON

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

BRUNO CHIRUMBOLO,

Defendant.

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**5:24CR00233**  
CASE NO.

Title 18, United States Code,  
Section 371

**JUDGE GAUGHAN**

COUNT 1

(Conspiracy to Defraud the United States, 18 U.S.C. § 371)

The United States Attorney charges:

1. From in or around 2014, and continuing through in or around 2018, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant BRUNO CHIRUMBOLO, Stephanie Condric (charged separately), Ron DiPietro (charged separately), and others did unlawfully, voluntarily, intentionally, and knowingly conspire, combine, confederate, and agree to defraud the United States by impeding, impairing, obstructing, and defeating the lawful Government functions of the Internal Revenue Service ("IRS") in the ascertainment, computation, assessment, and collection of the revenue: namely, individual income and employment taxes.

Manner and Means of the Conspiracy

2. It was part of the conspiracy that:

a. Condric, DiPietro, and others owned, operated, financed, managed, supervised, directed, and conducted the illegal gambling business known as Gametastic, which was located in or around Canton, Ohio.

b. Condric, DiPietro, and others derived and split the cash income earned by Gametastic.

c. At the direction of Gametastic's owners, including DiPietro, Defendant was the nominee owner of Gametastic. As the nominee owner of Gametastic, Defendant put the business in his name and represented to the public and the IRS that he owned the business.

d. Defendant, acting at the direction of DiPietro, reported wages paid by Gametastic to its employees on the Employer's Quarterly Federal Tax Returns, Forms 941, for an illegal gambling business called Wildcat. Defendant was the nominee owner of Wildcat.

e. Defendant prepared and filed, and caused to be filed, Employer's Quarterly Federal Tax Returns, Forms 941, for Wildcat that failed to report all of the wages paid to Gametastic's employees.

f. Defendant prepared and filed, and caused to be filed with the IRS, U.S. Individual Income Tax Returns, Forms 1040, for Condric that failed to report all of the income Condric received from Gametastic.

#### Overt Acts

3. In furtherance of the conspiracy, to effect the objects thereof, and to conceal the existence of the conspiracy, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant and others performed overt acts, including the following:

a. On or about February 27, 2017, Defendant prepared and aided and assisted in the preparation of a false Individual Income Tax Return for tax year 2016 for Condric that failed to report approximately \$48,300 in income Condric received from Gametastic. This resulted in a tax loss to the IRS of \$20,678.

b. On or about March 19, 2018, Defendant prepared and aided and assisted in the preparation of a false Individual Income Tax Return for tax year 2017 for Condric that failed

to report approximately \$285,823 in income Condric received from Gametastic. This resulted in a tax loss to the IRS of \$98,334.

c. From in or around 2015 through in or around 2017, Defendant prepared and filed, and caused to be filed, false Employer's Quarterly Federal Tax Returns, Forms 941, for Wildcat for each quarter of 2015 through 2017 that failed to report a total of \$198,994 in wages paid to employees of Gametastic. This resulted in a total tax loss to the IRS for these periods of \$40,543.

All in violation of Title 18, United States Code, Section 371.

REBECCA C. LUTZKO  
United States Attorney

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